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Radiofrequency Radiation Exposure Standards  
Australia and New Zealand, 100 kHz -300 GHz:

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**A Case For Reducing Human Exposure Limits Based On Low-  
Level, Non-Thermal Biological Effects**

**by A. H. Doull**

**Australian Commonwealth Scientific and Industrial Research  
Organization (CSIRO) Health and Safety Adviser,**

**and by**

**Dr. C. Curtain**

**CSIRO Honorary Research Fellow**

**January 1994**

RADIOFREQUENCY RADIATION EXPOSURE STANDARDS  
IN AUSTRALIA AND NEW ZEALAND  
100KHz - 300GHz

A CASE FOR REDUCING HUMAN EXPOSURE LIMITS  
BASED ON LOW LEVEL, NON THERMAL,  
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PART ONE

January 1994

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## Introduction

*"the proper course to adopt in setting a standard of this kind, where the effects of "low" levels of radiation are largely controversial is to give first priority to the safety of people...."*

*Dr David Hollway*

*CSIRO National Measurement Labs*

It took Dr David Hollway of CSIRO's National Measurement Laboratories many years of patient and sustained work but he was instrumental in the Standards Association finally establishing in 1985 the first Australian safety standard which set limits on exposure to radiofrequency radiation for the general population and for workers. Up until that time the standard that had loosely prevailed in Australia was the US Standard. The new Australian standard not only set more stringent limits for workers, reducing the allowable exposures from 10 mW/cm<sup>2</sup> down to 1 mW/cm<sup>2</sup> but also established a limit for the general population.

On the committee which met for seven years Hollway was outnumbered by the representatives of those interests which were fundamentally opposed to any restrictions and who as a matter of course denied and minimised all of the published evidence of harm. Getting agreement was not an easy matter. The disagreements were deep and the thousands of scientific papers in the international literature were then and still are divided on the issues of how these forms of radiation interact with living systems and on what could be considered a "safe" dose. The US standard was based on limiting, but not eliminating the heating effects of these forms of radiation, standards in Russia and throughout the eastern bloc countries were based on preventing more subtle effects on the nervous and endocrine system which, it was claimed, overtime, led to ill health.

The two schools of thought about the biological and health effects of microwave radiation safety, the thermal and the non thermal models were difficult but not impossible to reconcile so while the resulting first Australian standard was basically a thermal standard it was also at least cognisant of the possibility that the more subtle effects could not be entirely discounted, and in an unusual step for a western country, Australia began the process of taking these non thermal effects into account and established tougher limits than the US.

It is interesting to note that while these more stringent safety limits provided greater protection for working people these more stringent limits did not cause the nations meteorological or defence radars to become inoperable, nor did the various airport radars cease to work. The telecommunications systems continued to function including all of the telephone links, TV and radio stations and whole new technologies like the mobile phone have been introduced. It can hardly be argued that the Australian standard with its greater margin of safety has curtailed the development of these industries. In fact the industries have a very large comfort zone to operate within already and as far as Dr Hollway was concerned the margin of safety for the general population was insufficient.

Dr. David Hollway was critical of the 1985 Australian standard for not providing a sufficiently large safety margin for the general population and urged this be addressed in future reviews but he also pointed to the aspects for workers that were very good and which should be adopted in international standards.

The standard adopted in 1985 is now "under review". As John Adams of the US National Institute of Standards and Technology has recently noted in an article examining the power output of various types of communication equipment there have been increases in the power of radiating antenna which meant some exceeded safety standards.

*A decade ago most of these radios generated between 1 and 2 Watts of output power. In the past few years however transceivers that produce as much as 5 or 6 Watts have become available and are used as a means of improving communication range and system reliability. Unfortunately a by-product of this enhanced capability is an increase of field strengths in the vicinity of the transceiver and its antenna. 1*

This is one source of the push to water down safety limits. The excellent features of the Australian standard are under attack and there are moves to return to the higher levels of the 1960's and 70's. It is worth recalling what Hollway saw coming:

*A virtue of this standard is that it recognises that the ANSI(US) limit of  $5mW/cm^2$  in the microwave range does not provide an adequate safety factor to protect workers against non uniform heating (hot spots) and accidental focussing and reflections from metal surfaces. A level of  $5mW/cm^2$  would allow 50 watts to fall on each square metre, amounting to perhaps thousands*

*of watts over a working area. When it is remembered that only one half watt entering a human eye can cause a cataract in a fairly short time and that microwaves can be strongly concentrated by reflection and focussed by metal surfaces the advantages of the lower Australian level can be appreciated. The standard includes an absolute limit to the allowable limit to the allowable peak power density ( $1000\text{mw/cm}^2$ ). In this respect it is an improvement upon the current ANSI standard which would allow remarkably high levels...[2].*

He went on to warn of the attempts that are now being made to weaken the protection that has been established in Australia and how this attack on Australian conditions would be dressed up.

*As the good features listed above are departures from the ANSI standard, there is a danger of there being removed in some future revision on the pretext of compliance with standards in use overseas. The community should be on guard against this....*

*Is it over optimistic to hope that instead of taking this retrograde step, the Standards Association, through its representation on international bodies will be able to convince other countries that they should adopt the good features of the Australian standard?[3]*

*"Electromagnetic radiation is one of the forms in which matter exists. There is no rigid boundary between matter and radiation. It has been proven experimentally that certain elementary particles on interacting with one another, for example, an electron and a positron are transformed into electromagnetic radiation of a certain wavelength and conversely that elementary particles can be produced from an electromagnetic field." [4]*

## WHO IS EXPOSED

In this document we address only those parts of the electromagnetic spectrum 100KHz to 300GHz, the radio frequency frequencies commonly used in radar, telecommunications and industry and in medical and scientific applications.

NIOSH estimated that in 1980 there were 21,062,000 American workers potentially exposed to radiofrequency and radiofrequency radiation.[5]

The major occupationally exposed groups include all those using radiofrequency heaters, sealers and drying equipment. This equipment has been the subject of NIOSH hazard alerts in the past and was found to be considerably over exposing workers.[6] In Australia RF heater sealer workers were acknowledged by Joyner to similarly be overexposed and ignorant of the risks to their health.[7]

There are also other workers exposed to intense radio frequency fields in the metals industry where radio frequency radiation is used as the heat source in furnaces. These are recognised as being among the most intensely exposed of all exposed workers. [8]

We do not address specifically the Extremely Low Frequency part of the spectrum used in the distribution of electrical power but we urge the review of existing woefully inadequate guidelines and the development of standards for the ELF part of the spectrum in the light of substantial evidence associating an increased risk of cancers in both the general public, particularly children, and among workers who are occupationally exposed.



## RF EXPOSED WORKERS INCLUDE THE FOLLOWING:

### Automotive workers

- drying of trim base panels
- embossing of heel pads to carpets
- heat sealing body interior trim panels
- heat sealing vinyl and convertible roofs
- heat sealing seats

### Furniture and Wood Workers

- decking assembly
- door lamination
- fibreboard fabrication
- fibreboard or plywood scarf giuing
- plywood panel patching
- ski lamination
- veneer panel gluing

### Glass Fibre Workers

- drying and curing work

### Paper Product Workers

- drying resin coatings
- heating coatings on continuous webs
- gluing paper
- correcting moisture profiles on continuous webs

### Plastic heating and sealing

- countless wrapping and sealing products from plastic gloves to oxygen tents, pharmaceuticals, food packages, baby pants and nappies etc ,

### RF Radiofrequency Application Workers

- Advertising RF excited gas display signs
- ceramics drying
- chemicals activation of chemical processes